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March 24, 2023

BY ECF

Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Noheme Perez v. Yvonne Edwards, et al.  
20-CV-1359 (LJL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants Yvonne Edwards and Geoffrey Wyrick in the now dismissed above-referenced matter. In furtherance of Your Honor's Order dated February 28, 2023, defendants write to respectfully request a *brief* extension of our time to submit our "reasonable fees and costs and all other expenses," from March 24, 2023 until March 31, 2023. This is defendants' second request for an extension of this deadline.

By way of brief background, on February 28, 2023 Your Honor dismissed the instant matter and imposed sanctions against plaintiff. *See* Civil Docket Entry No. 91. Specifically, Your Honor conditionally awarded "Defendants' reasonable attorneys' fees and costs incurred for filing their motions for dismissal based on the failure to prosecute and for sanctions, for preparing the pretrial order, and for attending the final pretrial conference that Plaintiff's counsel failed to attend," the costs of the same-day transcript of the final pretrial conference, and "Defendant Wyrick's out-of-pocket expenses for travel to New York for attendance at the trial." *Id.*

Defense counsel has now obtained records from our client and is in the process of reviewing this documentation, and is still in the process of finalizing our submission as it relates to our attorneys' fees and costs. Additional time is needed to complete this process, and to further finalize an affidavit from the defendant regarding his costs. Counsel are working

diligently to complete internal protocols prior to submission, to ensure that an accurate accounting is requested from the Court.

Accordingly, defendants write to respectfully request a second extension of time to submit defendants' "reasonable fees and costs and all other expenses" from March 24, 2023 until March 31, 2023. Defendants thank the Court for its time and consideration of this application.

Respectfully submitted,

*KellyAnne Holohan* /s/  
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*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: *All Counsel of Record* (Via ECF)